



Maryland Department of Planning

FILE COPY

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

September 24, 2007

Ms. Helen Spinelli
Department of Planning and Zoning
Queen Anne's County
160 Coursevall Drive
Centreville, MD 21617

RE: Centreville Community Plan

Dear Ms. Spinelli:

The Maryland Department of Planning has completed the coordinated review of the update to the Centreville Community Plan. The draft Plan was sent to the Maryland Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, Agriculture, and the Maryland Emergency Management Agency. To date, comments have been received from the Maryland Department of Transportation, the Maryland Departments of the Environment, and Natural Resources. They are attached and any additional comments received after the date of this letter will be forwarded to you upon receipt.

Our planning staff has reviewed the proposed update for consistency with the Planning Act of 1992, the Smart Growth Areas Act of 1997, and other State growth management principles and policies. Our review comments are attached for your consideration.

Please contact Mr. Mark Gradecak at 410-819-4080 or me at 410-767-4500 if you have any questions about these comments or if we can be of any further assistance. The Maryland Department of Planning looks forward to continued planning coordination with Queen Anne's County and the Town of Centreville.

Sincerely,

Stephanie Martins
Director, Land Use Analysis and Planning Assistance

attachments

cc: Mark Gradecak

**Maryland Department of Planning
Review Comments
Draft Centreville Regional Plan**

During the 2006 legislative session House Bill 1141 was passed requiring Counties and Municipalities address several new elements within their Comprehensive Plans. Under the provisions of this law all new elements will need to be included into comprehensive plans by October 1, 2009. Guidance documents for the Municipal Growth Element and the Water Resources Element are available at the Maryland Department of Planning website (<http://www.mdp.state.md.us/>).

It is unclear from the draft plan if the Town intends for this plan to meet all of the requirements of the new required elements. MDP has reviewed the plan for compliance and offers the following comments.

MUNICIPAL GROWTH ELEMENT

GROWTH CAPACITY/BUILD OUT ANALYSIS

We commend the Town on its incorporation of a build out analysis in the draft plan. The Town has also done a good job of establishing population projections and identifying future growth areas. However, the draft plan does not adequately link the Town's future population projections (demand) and the findings of the development capacity (supply). The Town has a projected growth of 2,760 persons between 2005 and 2025 (pg. 3-4), while the capacity analysis reveals a total capacity for the town and growth areas of 13,675 (Town- 1,754 and Growth Areas- 11,921). (pg.4-27). When planning for future growth it is important to strive for a balance between land supply and demand:

- Provide too little land for development (be it on greenfields, redevelopment, or infill), and the land cost will become too high or development may spill over to adjacent jurisdictions.
- Provide too much land for development and it will tend to be used inefficiently. In addition, plans and growth controls will be marginalized because there are an abundance of locational options fore each new development.

The Town should provide a timeframe for annexation or establish a prioritization schedule for the growth areas. This will help ensure for the proper balance between land supply and demand.

1. Page 4-25 of the plan discusses the differences between MDP's capacity analysis for future growth areas and the analysis completed by the author of this Community Plan. The Town may want to exclude the comment regarding MDP's growth area analysis as this part of MDP's analysis is not provided in the draft Plan. Additionally, there is no reference to Map 1 in the plan (follows page 4-27), this map is part of MDP's analysis. The Town may want to include this map in the appendix.

2. It is noted that the author of this plan assumed higher densities for growth areas 3 and 4 of this plan than MDP's analysis (pg. 4-25). Both of these growth areas have substantial county easements, limiting the capacity of these areas. The Town may want to consider this in the capacity analysis. Growth area 3 currently has a capacity of 346 housing units with an additional 1,018 housing units of capacity in growth area 4.
3. On page 4-16 of the plan reference is made to table 4-2. In this section, table 4-2 is said to provide "a tabulation of housing and population projections for the Infill Areas and the Growth Areas." This description is somewhat confusing. Table 4-2 shows the projected capacity for population and housing units at build out for these areas. This could be interpreted as the projected population growth expected for this plan. Additionally, the title of table 4-2 is confusing because the table is not showing population growth for the plan's horizon year of 2025. This should be clarified in the plan.

PRIORITY FUNDING AREAS/ANNEXATION

A map and discussion of the Town's Priority Funding Areas should be included in the plan. Also a statement concerning possible future expansion(s) to the current PFA would also aid in subsequent reviews for determining "consistency with the comprehensive plan."

Additionally, the plan states that the Town will annex growth areas as needed. It should be noted that if the Town intends on certifying these areas as (PFAs) they will be subject to a supply and demand test as part of the certification process. This test is now required as part of legislation passed by the General Assembly in 2006. As a reminder, it should be noted that areas which may have been certified as County PFA's do not automatically convey that status following an annexation. For more information see MDP's website (<http://www.mdp.state.md.us/hb1141.htm>).

INFRASTRUCTURE

HB 1141 requires the Municipal Growth Element examine the relationship between infrastructure supply and future demand. This includes: public school capacity, library services, police, fire, water and sewer facilities, stormwater management systems and recreation facilities. The draft plan only partially specifies the impacts of proposed development on these facilities.

1. Table 5-1 on page 5-19, is titled "Future Water and Sewer Needs," this table only shows the anticipated sewer needs for build out in each infill and growth area. This table should be changed to reflect the data shown. It would also be helpful if the Town provided a second Table showing the water needs associated with each area. These tables would serve this plan better if moved after the discussion on water and sewer (pg. 5-10).
2. The state rated capacity for each school should be included to better access future needs (pg.5-16).

FINANCING MECHANISMS

MDP supports investigating the feasibility of establishing an impact fee for development in Growth Areas.

WATER RESOURCE ELEMENT

Many of the required WRE items are mentioned in this document and much of the remaining information should be readily available. Where gaps in baseline data exist, the Plan should note those issues and provide guidance for future updates and revisions to fill in data as it becomes available.

The population and housing projections are descriptive of recent history slow growth prior 2004 and post 2004 (fast growth). The population projection figures on page 3-4 use a current trend method postulating on the rate of growth between 2000 and 2005. That produces a 2025 population total of 5,420, a 103% increase over the 2005 estimate of 2,660 residents. The population projections on page 3-4 should incorporate the projected number of households then project demands for both water supply and wastewater utilities on 5 year intervals. Table 4-2 provides a breakdown of the infill and growth area development capacities which could add an additional 4,967 dwelling units. This would add an additional 1.24 MGD of water and wastewater demand from residential needs only. An additional 200,000 gpd is projected for commercial and industrial demands. The discussion of the water and sewer needs analysis on pages 5-6 through 5-10 indicate that a 1.65 MGD build out demand is the basis for identifying the future needs that would require an additional land area of 1100 acres to serve for the land application wastewater processing. The plan calls for future land area needs to be provided by the development as it would occur. To meet the current development commitments the Town indicates the need to acquire additional land areas and investigate the availability of assimilative capacity of Gravel Run, Mill Stream, and ultimately, the Corsica River. The plan should indicate the amount of these current allocations and add that to the current flow demands and provide the remaining plant capacity for a more accurate accounting of the treatment plant capacity / land application acreage limits. From the current wastewater treatment demands it does appear that the Town has a sufficient supply of water and the ability to process the wastewater for a portion of the future growth, however a more complete growth analysis tied to the public utilities needs to be prepared, both for the WRE and County's Water and Sewer Plan.

The items needed to address the Water Resources Element are listed below. The Town should refer to the Water Resources Element and the Municipal Growth Element Models and Guidelines for a more complete explanation of the component requirements.

For the water supply parameters, the Element must address:

- the source(s) of raw water and each source(s) maximum reservoir,
- who is responsible for the supply and the delivery of the drinking water,
- the current water demand to the size of the population being served,
- the future water supply demand that the infill areas and growth areas would require if served,

- any water supply issues and system management that the growth plans might cause need to address,
- Any water conservation plans or emergency supply plans that might be implemented.

The waste water parameters require discussion of:

- who is responsible for the management and operation of the waste water collection system,
- inter-jurisdictional agreements if applicable,
- identification of the discharge locations and types of systems being used for treatment,
- the total maximum daily loads (TMDL's), if applicable,
- the Chesapeake Bay Tributary Strategic point source caps for the discharge,
- the current quality of the treated effluent in terms of nitrogen (N) and phosphorus (P) loading and any other contaminant that may be of concern to the watershed,
- the future N and P loading that each new area of service would contribute,
- the current estimation of all non-point source N and P loading (septic, storm water, agricultural lands etc.) and the future loading that the identified growth areas would contribute, and
- while not required but necessary to manage growth and environmental stewardship, the Public Facilities and Community Services capital projects that are funded and those that may be needed to address the growth demands outlined in the Plan, including those that will serve to minimize pollution loading, both point and non-point sources.

Many of the items listed above are included; however, the Plan should complete the missing items and reorganize the requirements for the Municipal Growth Element and the Water Resources Element in a more focused manner to assist in meeting the new language of Article 66B. There appears time between now and October 2009 to accomplish these tasks. *The Plan should provide an explicit statement to that effect in the Implementation Element and a draft timetable for addressing the additional work.*

HOUSING ELEMENT (Optional)

House Bill 1160 established a Workforce Housing Grant Program. To be eligible for monies from this grant the City is required to include a Work Force Housing Element in the Comprehensive Plan. A Workforce Housing Element of the Comprehensive Plan should include:

- Preservation or renovation of existing housing stock;
- Redevelopment of existing residential areas;
- Streamlined regulatory process;
- Reduced regulatory fees for construction or renovation and leveraging of Federal financial assistance;

- Financial incentives for construction and renovation;
- Special zoning regulations including inclusionary zoning;
- Efforts to preserve workforce housing stock for subsequent program participants; and,
- Coordination with neighboring jurisdictions and private sector employers.

TRANSPORTATION COMMENTS

Any new residential or commercial development projects should be evaluated for adverse impacts on local traffic patterns and volumes. It would also be helpful to show the Town's certified Priority Funding Area (PFA) boundaries on the transportation element map in order to clarify the relationship of proposed roads to PFA's.

MISCELLANEOUS COMMENTS

On page 3-3 of the draft plan, number 8 states that the "the Maryland Department of Planning (MDP) estimated that the 2005 population was..." the MDP does not produce population estimates at the municipal level these data are produced from the United States Census Bureau, estimates division. This reference should be corrected.

Figure 3 – Centreville Planning Area: This appears to be the same "graphic" as Figure 2 Town Base Map [only printed at a larger scale]. The map displays no planning area boundary.

Figure 4 – Existing Town Land Use Map: The Town Land Use map also shows the land use of several County Parcels. This can be confusing to readers.

Figure 5 – Existing County Land Use: This map displays all of the County parcels/land uses but also displays the Town parcels/land uses. Both figures 4 and 5 appear to contain the same data but are merely printed at somewhat different scales. Clarity could be improved by limiting the data display to the corresponding title

Figure 9 – Town Zoning Districts and Figure 10 – Town and County Zoning Districts suffer from the same issue described above for the land use maps. They appear to be the same data set, share the same legends, and are merely printed at slightly different scales. While town parcel legibility is increased by printing the corresponding views at a smaller scale, the extraneous information is distracting.

Figure 12 – Future Town Growth Area and Greenbelt. This is a very useful graphic for understanding the spatial relationships and geographic limits of the various growth areas as well as parcels contemplated to comprise a long term greenbelt that limits the Town's ultimate growth and build out potential. However, figure 12 could be made even more useful and provide important annexation guidance by including annexation priorities and general timeframes for their completion. That would also provide important and timely input for needed updates prepared by the Town to their section of the County Water and Sewer Plan.

Page 7-7 contains the statement: "The Town's historic district has been defined geographically." It would be very useful to include such a graphic with the Plan's discussion regarding historic character and historic resources that are important for preservation. In point of fact, a very significant historic property is opposite the Post Office on the corner of Railroad Avenue and Banjo Lane. That same corner is depicted as being part of several infill redevelopment scenarios, none of which include protection or preservation of this property. Such a decision should be clearly described in the Plan, and if it is not the intent to destroy that parcel then its protection should be clearly incorporated into the infill and revitalization element. That element should be expanded to address recent infill and revitalization mixed use developments on Pennsylvania Avenue and Railroad Avenue, relating that activity to that planned for the interior off Banjo Lane.

Chapter 9 – Centreville Community Plan Recommendations: That title could be improved by changing it to: Implementation Element [as contained in Article 66B]. Each of the other elements contains recommendations as well, and it is unclear whether all recommendations have been reproduced in summary form in this chapter. The cross-referenced index at the end of this chapter is very useful and is an innovative improvement for which the Town is complimented.

Some additions and clarifications might be successfully incorporated through the addition of an appropriately titled appendix. Thank you for the opportunity to provide constructive comments.